

7.0 COMMENTS AND COORDINATION

As part of the process of fulfilling the requirements of NEPA for the Gravina Access Project, the DOT&PF and the project team solicited comments from the Ketchikan community and coordinated with many governmental agencies. The purpose of this coordination effort is to produce an EIS that is based on the best available information and reflects the input of all interested parties.

A primary component of the Gravina Access Project has been early involvement of key stakeholders and the integration of the public's comments, concerns, and input into the process. In 1999, the DOT&PF project team developed the *Gravina Access Project Public Involvement Plan* to formally document how it would exchange project information with those who have interests that are potentially affected by the project. These persons are members of the general public and representatives of businesses, special interest groups, governmental entities and agencies, and Alaska Native organizations.

A major element of the public involvement program is the development and maintenance of a project website on the Internet (at www.gravina-access.com). The website functions as an electronic bulletin board and library that make available to the public all project study reports; background information; the current project status, schedule, and recent activities; graphic displays of the route of each proposed alternative; contacts and an e-mail address for sending comments and requesting further information; links to the websites of the DOT&PF and other relevant agencies; and other project information.

The project team obtained public comments and coordinated with agencies primarily through two important processes: project and agency scoping (including a Public Involvement Plan) and other agency coordination (principally through the Project Development Team), as described later in this chapter.

7.1 Public and Agency Scoping Process

7.1.1 Environmental Scoping Process

Purpose. Project scoping is a National Environmental Policy Act (NEPA) requirement in which project planners initiate a dialog with public agencies, communities, nongovernmental organizations, interested parties, stakeholders, and the general public. The purpose of scoping is twofold: to solicit participants' views and to inform them about the proposed project and its development schedule. In addition, scoping documents public outreach activities and the input of all participants.

Early Participation. Scoping is the starting point in developing an environmental document that meets all requirements and becomes the basis of agency deliberations and decisions. The first scoping activity is to provide early notification of the project to the local community, the general public, and the regulatory agencies. Project planners can then solicit input from interested parties in the first stages of the project.

Goals. In scoping for NEPA, project planners employ two-way information exchange to reach three specific goals:

Ascertain the project's key issues, potential benefits, and alternatives to be addressed by the NEPA document.

Determine specific needs for special technical studies.

Identify sources of information.

Techniques. The most commonly used scoping techniques were meetings with the public and the regulatory agencies, individual outreach to interested parties, public notices, public open houses and information meetings, newsletters mailed to residents and inserted into the local newspapers, formal solicitation of written comments, meetings with elected officials and agency representatives, consultations with a project development team, and, more recently, information posted on a project website.

Outcome. The outcome of the scoping process was definition of the project scope of study, and project alternatives that reflect the input from the community and regulatory agencies. This enabled the project planners to productively focus preliminary engineering and environmental analysis work.

Scoping Plan and Report. Before scoping began, project planners developed a scoping plan to guide the project team throughout the scoping process. At the completion of scoping, all scoping activities were summarized in a report that documents the input received from all interested parties.

7.1.2 Notice of Intent

For the proposed Gravina Access Project, the FHWA (in cooperation with the DOT&PF) published a Notice of Intent (NOI) To Prepare an Environmental Impact Statement in the *Federal Register* on February 22, 1999. The NOI presented the project purpose and invited public participation. The NOI was also posted on the Gravina Access Project website (www.gravina-access.com) and the DOT&PF's Internet homepage (www.dot.state.ak.us), and it was published in the following:

Alaska Journal of Commerce
Anchorage Daily News
Ketchikan Daily News
The Local Paper
Juneau Empire
Island News
Petersburg Pilot
Wrangell Sentinel

7.1.3 Project Scoping Plan

At the outset of this project, the project team developed a Scoping Plan¹ to specify in detail its scoping activities.

¹ DOT&PF, *GAP Scoping Plan*, prepared by HDR Alaska (September 1999)

Contents. The Scoping Plan governed determination of the project need and purpose, development of a scope of work, identification of cooperating agencies, deciding what technical studies would be undertaken and by whom, setting a project schedule, and setting the dates and locations of scoping meetings. The plan described the anticipated scoping tasks and techniques, specified the scoping work products, and established a schedule of scoping activities.

Coordination with Other Planning Activities. The Scoping Plan expressed DOT&PF's intent to closely coordinate project scoping with other related projects in Ketchikan, including the Airport Master Plan, the U.S. Forest Service Tongass Gravina Island timber sale, and the Ketchikan Gateway Borough's 2020 land use planning program.

7.1.4 Scoping Activities

7.1.4.1 Initial Scoping Activities

Initial project scoping activities were conducted from August through December 1999. The two major events were a scoping meeting with the regulatory agencies and a public scoping meeting.

Initial Ketchikan Meetings

Project scoping began in Ketchikan on August 11, 1999, when the project team presented an overview of the proposed project to the Ketchikan Chamber of Commerce. The team also met informally with representatives of regulatory agencies to begin identifying agency-specific issues and concerns.

Initial Agency Scoping Meeting and Agency Comments

The initial scoping meeting for regulatory agencies was held in Juneau on September 27, 1999, with a teleconference connection for participants located in Ketchikan and Anchorage. The scoping meeting was an interactive and collaborative discussion of proposed project alternatives, facilitated by HDR Alaska's project team members on behalf of the DOT&PF. The participants' objectives were to determine major regulatory and permitting concerns, identify agency likes and dislikes, and define information needs. The project team invited representatives of Native organizations and local, state, and federal agencies, and sent all invitees a packet of advance information about the project in mid-September.

Participants. The participating agencies and organizations were:

Juneau:

- Federal Highway Administration (FHWA)
- National Oceanic and Atmospheric Administration (NOAA Fisheries (previously National Marine Fisheries Service [NMFS]))
- U.S. Army Corps of Engineers (COE)
- U.S. Coast Guard (USCG)
- U.S. Forest Service (USFS)
- Alaska Department of Environmental Conservation (DEC)
- Alaska Department of Natural Resources (DNR)
- Alaska Department of Transportation and Public Facilities (DOT&PF)
- Alaska Division of Governmental Coordination

Ketchikan:

U.S. Forest Service (USFS)
Alaska Department of Fish and Game (ADF&G)
Ketchikan Gateway Borough (Borough)
Cape Fox Corporation

Anchorage:

Federal Aviation Administration (FAA)
Ketchikan Gateway Borough (Borough)

Initial Public Scoping Meeting and Public Comments



The initial public scoping meeting was held in Ketchikan on October 6, 1999, and was attended by approximately 110 members of the community. The meeting was advertised in the *Ketchikan Daily News*, *The Local Paper*, and the *Juneau Empire*, and a post-card announcement was mailed to all Ketchikan residents in late September. The meeting was structured as a planning fair, at which multiple local, state, and federal agencies were invited to set up booths and present their respective planning activities, especially as they relate to the project.

Participants. The participating agencies and their particular interests and responsibilities were:

U.S. Army Corps of Engineers (COE)—U.S. waters and wetlands planning
U.S. Coast Guard (USCG)—Navigation oversight in Tongass Narrows
U.S. Environmental Protection Agency (EPA)—Wetland and watershed planning
U.S. Forest Service (USFS)—West Gravina Island proposed timber sale
Alaska Department of Natural Resources (DNR)—Five-year schedule of timber sales
Alaska Department of Transportation and Public Facilities (DOT&PF)—Ketchikan International Airport master plan
Alaska Division of Governmental Coordination—Coastal management planning
Alaska Mental Health Trust Land Office—Trust resources asset planning
Ketchikan Gateway Borough—Ketchikan 2020 comprehensive planning
HDR Alaska (project team consultant)—Gravina Access Project

Agenda. The public meeting began with an open house from 3:00 to 8:30 p.m., during which attendees browsed through the information displays and talked with the agency representatives. Handouts presented the statement of the project purpose and the need for action. The project team then made a formal presentation to introduce the Gravina Access Project to the public, and conducted a question-and-answer session afterwards. The meeting served as a venue for verbal comments, and attendees could also comment in writing, both at the meeting and later (via a pre-addressed, mail-in comment form). Written comments were accepted for approximately one month after the meeting.

Other Initial Scoping Activities

Generally, the other initial project scoping activities comprised:

- Numerous informal agency meetings for exchange of information and discussion of issues specific to a particular agency

- Analysis of revised regulations issued in May 1999 regarding Section 106 of the National Historic Preservation Act (NHPA), regarding consultation with Native groups and other interested parties

- Compilation of mailing lists for dissemination of project information and meeting notices to agencies, businesses, nongovernmental organizations, Alaska Native organizations, and Ketchikan residents

- Newsletter(s) to publicize project planning activities and status (mailed to mailing list, inserted in the *Ketchikan Daily News*, and distributed to various organizations for insertion in their newsletters)

- Postings of project information on public bulletin boards

- Establishing and maintaining a project drop-in information center at 306 Main Street, Suite 312, in Ketchikan (initially open weekdays from 8:00 a.m. to 5:00 p.m.) and a project information kiosk (first in the Plaza Mall, then in the airport)

- Distribution of public service announcements to local radio and television stations in Ketchikan and Juneau

- Distribution of a flyer about the project to elementary school students

- Posting of project information and status on the project website (www.gravina-access.com) and the DOT&PF Internet home page (www.dot.state.ak.us)

Gravina Access Project

Presented by the Alaska Department of Transportation & Public Facilities

Volume 3 February 2003



DOT&PF Announces its Recommended Alternative

On January 7, 2003, Joe Perkins, Commissioner of the Alaska Department of Transportation and Public Facilities (DOT&PF), announced Alternative FS – the bridge alternative that crosses Pennock Island – as DOT&PF's recommended alternative for the Gravina Access Project. The DOT&PF's recommendation was based on its careful review of technical studies conducted for the Gravina Access Project during the past year. The DOT&PF made its recommendation publicly known to encourage a dialogue within the community and give the community's input on a recommended alternative.

The recommended alternative was selected over seven other alternatives and the no action alternative. Commissioner Perkins said the Pennock Island crossing was chosen because it best meets the community's need for improved access to Gravina Island, allows the passage of major cruise ships, has less impact on Rumpke traffic and the Ketchikan International Airport, will be less visibly intrusive, and uses bridge structures that are not as technically challenging as other alternatives. Building the crossing at Pennock Island is estimated to cost \$100 million.

Ketchikan Community Encouraged to Review the Alternatives and Make its Recommendation

Now that the DOT&PF has made its recommendation for the Gravina Access Project, it is time for the community to weigh in and provide input. Over the next couple of months, the DOT&PF is soliciting input from members of the community on the evaluation of all of the alternatives currently under consideration and DOT&PF's recommendation for the Pennock Island crossing, Alternative FS. A Public Open House will be held on Monday, February 11 at the Tird Ferry Civic Center from 5pm to 8pm. This meeting is intended as an opportunity for the public to meet with the Gravina Access Project Team and ask questions regarding the alternatives analysis, as well as the factors that went into DOT&PF's recommendation.

Technical Reports Available for Public Review

Over the past year, the Gravina Access Project Team has conducted numerous engineering and environmental studies to refine project design information and evaluate the potential environmental impacts of the project alternatives. These studies include detailed evaluations of economic impacts, impacts to navigation in Tongue Narrows, impacts to Rumpke operations, costs associated with construction and long-term use of each alternative, and impacts to wildlife habitat and other natural resources. The findings of these studies are summarized in a report entitled "Alternatives Evaluation – Summary Report." The summary report and the supporting technical reports are now available for public and agency viewing at the following locations – the Ketchikan Public Library, Gravina Access Project office (Midland – Peoria Architects, LLC 300 Mill Street, Suite 205) in Ketchikan, and the project website www.gravinaaccess.com. The public is invited to review these studies and become informed on the project alternatives and their potential effects.

The findings of the technical studies will be used as the basis for developing the environmental impact statement for the project. By making the technical reports available to the public, the project team hopes to (1) facilitate the community's discussion of the recommended alternative and (2) get feedback from the community on the information provided.

www.gravina-access.com

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SAMPLE PROJECT NEWSLETTER

Scoping Summary Report (1999)

The project team documented the initial scoping activities in the Scoping Summary Report,² issued in December 1999. The text of the document, including a summary of issues, along with agency letters appears in Appendix R of this EIS. The full report is on file at DOT&PF. This report includes:

- Description of the scoping methods used
- Chronological list of scoping activities
- Summaries of the public comments received
- Written comments from participating agencies
- A summary of the public meetings
- Transcripts of the agency scoping meetings
- Copies of the meeting sign-in sheets
- Suggested new alternatives
- A list of identified information sources
- Determination of special studies required to adequately assess impacts
- Copies of newspaper display ads, newsletters, and public service announcements
- Mailing lists for agencies, businesses, and organizations

7.1.4.2 Continuing Scoping Activities

From December 1999 through June 2000, the project team continued its public outreach with more than 70 scoping activities.³ In addition to soliciting more public input, the team worked to obtain agency concurrence on the project purpose and need, develop and refine the project alternatives, and begin environmental fieldwork. The major events were four more public meetings, numerous “one-on-one” meetings with various agencies, and several meetings of the Project Development Team (see Section 7.3.2). The project team continued to solicit and accept public and agency comments at the public meetings, at informal meetings, and via e-mail, telephone, and U.S. mail.

Four Public Meetings

Early in 2000, four public meetings were held in Ketchikan—two on January 27 and two on April 12. These meetings afforded the public additional opportunities to become informed about the project, continue the dialog with the project team and agency representatives, and comment on the project, both formally and informally.

January 2000. The January meetings presented a summary of the scoping results, public involvement activities, technical studies, an economic analysis, and results of a ferry service survey. The project options being developed were described, including computer-simulated visualizations. The meetings concluded with extensive question-and-answer periods.

April 2000. The April meetings continued the exchange of information and concerns between the project team and the public, with presentations describing 16 project options and further

² DOT&PF, *GAP Scoping Summary Report*, prepared by HDR Alaska (December 1999)

³ DOT&PF, *GAP Scoping Summary Report—June 2000 Supplement*, prepared by HDR Alaska (October 2000)

questions and answers. Many of the questions were related to the estimated project costs and funding sources.

Meetings with Government Agencies

The team consulted further with resource agencies to review the methodology for analyzing impacts, identify previous studies of the project area or specific environmental resources, and determine environmental and land use constraints on particular alignment alternatives. The following agencies were consulted:

Federal Aviation Administration (FAA)
National Oceanic and Atmospheric Administration, NOAA Fisheries (previously National Marine Fisheries Service [NMFS])
U.S. Army Corps of Engineers (COE)
U.S. Coast Guard (USCG)
U.S. Environmental Protection Agency (EPA)
U.S. Fish and Wildlife Service (USFWS)
U.S. Forest Service (USFS)
Alaska Department of Commerce
Alaska Department of Environmental Conservation (ADEC)
Alaska Department of Fish and Game (ADF&G)
Alaska Department of Natural Resources (DNR)
Alaska Division of Governmental Coordination (ADGC)
Alaska Mental Health Trust Lands Office
Ketchikan Gateway Borough (KGB)
City of Ketchikan
City of Saxman
Organized Village of Saxman
Ketchikan International Airport

Meetings with Other Organizations

The project team continued its information exchanges and outreach to interested parties by meeting with the following organizations and businesses:

Alaska Marine Pilots Board
Cruise Line Agencies of Alaska
Holland America
Ketchikan Chamber of Commerce
Ketchikan Indian Corporation Tribal Council
North West Cruiseship Association
Princess Cruises
Tongass Narrows Work Group
USFS Gravina Timber Sale EIS Interdisciplinary Team

Other Continuing Scoping Activities

Among the continuing project scoping activities were:

- Meetings of the Project Development Team (PDT) (see Section 7.3.2)
- Maintaining a project kiosk in Ketchikan
- Two additional public meetings (February 11 and 27, 2002)

- Public newsletters (posted on the project website and inserted into the *Ketchikan Daily News*) dated September 1999, December 1999, February 2000, October 2000, and February 2002

Scoping Summary Supplement (2000)

In October 2000, the project team documented the continuing scoping activities in a supplement to the *Scoping Summary Report*.⁴ This report listed all scoping activities between January 1 and June 30, 2000; summarized the additional public comments received; contained the agency concurrence on the project purpose and need; and appended copies of the project newsletters during that period. The text of the report, including an issues summary, along with agency letters, appears in Appendix R of this EIS. The full report is on file with DOT&PF.

Additional Public Comment

In June 2002, the project team documented public input associated with the Alternatives Evaluation and announcement of a “recommended” alternative. DOT&PF announced in January 2002 that Alternative F3 was recommended. Comments were solicited between January and April 2002. These were compiled in *Alternatives Evaluation Summary Report – Public Comment Summary*.⁵ (Subsequently, the recommendation was reversed, Alternative F1 was brought back as a reasonable alternative, and Alternative F1 is now identified as the DOT&PF Preferred Alternative. See Section 2.1.4). The text of the *Alternatives Evaluation Summary Report – Public Comment Summary*, including an issues summary, along with agency letters, appears in Appendix R of this EIS. The full report is on file with DOT&PF.

Summary of Scoping Activities

The project scoping activities are summarized in Table 7-1 (Project Scoping Activities [1999-2002]).

⁴ DOT&PF, *GAP Scoping Summary Report—June 2000 Supplement*, prepared by HDR Alaska, October 2000.

⁵ DOT&PF, *GAP Alternatives Evaluation Summary Report – Public Comment Summary*, prepared by HDR Alaska, June 2002.

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
08-10-99	Meeting with U.S. Coast Guard (USCG) re USCG issues	Juneau	Dalton
08-11-99	Coordination meeting with City of Ketchikan	Ketchikan	Dalton
08-25-99	Meeting with Ketchikan Gateway Borough (Borough) re local planning	Ketchikan	Dalton
08-25-99	Meeting with U.S. Forest Service (USFS) re USFS West Gravina Timber Sale EIS process	Ketchikan	Dalton
08-30-99	Meeting with U.S. Army Corps of Engineers (USCOE) re wetlands and Section 404 requirements	Anchorage	Dalton
09-01-99	Gravina Access Project (GAP) Newsletter, Volume 1, with introduction to project (insert in <i>Ketchikan Daily News</i> plus overrun)	---	---
09-09-99	Meeting with USCG re USCG issues	Juneau	Kyle, Dalton
09-15-99	Meeting with Alaska Department of Fish and Game (ADF&G) and USFWS to obtain agency issues of concern	Ketchikan	Dalton, Reich
09-16-99	Meeting with Borough and USFS re land ownership, access, and development issues on Gravina Island	Ketchikan	Dalton
09-27-99	Agency scoping meeting (with teleconference link to Anchorage)	Ketchikan, Anchorage	Dalton, McPherson, Brooks
10-06-99	Open house and public scoping meeting (Ketchikan Planning Fair)	Ketchikan	---
10-22-99	Meeting with Ketchikan International Airport (KIA) Affairs Committee Chair re aviation issues	Ketchikan	Dalton, Hippe, Klugherz
11-03-99	Follow-up meeting with Tongass Conservation Society (TCS)	Ketchikan	Dalton, McPherson, Klugherz
11-04-99	Project Development Team (PDT) meeting in Ketchikan (with teleconference links to Juneau and Anchorage)	Ketchikan, Juneau, Anchorage	Project Team
11-30-99	Meeting with USCOE re wetlands analysis	Anchorage	Leggett
12-01-99	GAP Newsletter, Volume 2, summarizes issues and concerns raised at the 10-99 public scoping meeting insert in <i>Ketchikan Daily News</i> plus overrun)	Ketchikan	---
12-09-99	Presentation to Ketchikan Chamber of Commerce Transportation Committee	Ketchikan	Klugherz
12-14-99	PDT meeting in Ketchikan (with teleconference links to Juneau and Anchorage)	Ketchikan	Project Team
01-04-00	Meeting with ADF&G re crossing alignment and fish and wildlife issues	Ketchikan	Klugherz
01-10-00	Discussion with ADF&G re wetlands, Lewis Creek drainage, estuaries, and shorebirds	Gravina	Morsell, Leggett
01-11-00	PDT meeting in Ketchikan (with teleconference links to Juneau and Anchorage)	Ketchikan	Project Team
01-12-00	Meeting with U.S. Environmental Protection Agency (EPA)	Seattle	Dalton
01-12-00	Discussion with U.S. Fish and Wildlife Service (USFWS) re wetland types in the project area	Ketchikan	Morsell, Leggett
01-13-00	Discussion with ADF&G re background information on seabird populations in Tongass Narrows	Ketchikan	Reich

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
01-13-00	Discussion with USFWS re background information on seabird populations in Tongass Narrows	Ketchikan	Reich
01-13-00	Discussion with USFS soil scientist re wetland functions	Ketchikan	Leggett
01-13-00	Discussion with USFS ecologist re wetland functions assessment methods	Ketchikan	Leggett
01-17-00	Meeting with KIA manager, Tim Garton	Ketchikan	Springer
01-19-00	Preliminary alternatives discussion with Federal Aviation Administration (FAA)	Anchorage	Kyle, Hippe, SlatonBarker
01-20-00	Presentation to Senator Frank Murkowski	Ketchikan	Klugherz
01-21-00	Public service announcement for 01-27-00 public meeting	Ketchikan	Brooks
01-23-00	Public meeting advertisement in <i>Ketchikan Daily News</i> Saturday-Sunday edition, and <i>Juneau Empire</i> Sunday edition	Ketchikan	---
01-24-00	Meeting with USFS re timber harvest on Gravina Island and within Ketchikan Ranger District	Ketchikan	Klugherz, Burden
01-24-00	Discussion with Alaska Ship and Drydock (AS&D)	Ketchikan	Burden
01-25-00	Meeting with Steve Seley re sawmill on Gravina Island	Ketchikan	Klugherz, Burden
01-25-00	Discussion with realtors re property on Gravina Island	Ketchikan	Klugherz, Burden
01-25-00	Meeting with Ketchikan Assistant City Manager Jim Voetberg	Ketchikan	Klugherz, Burden
01-26-00	Meeting at Ketchikan Hospital discussing hospital issues	Ketchikan	Klugherz, Burden
01-26-00	Meeting at Borough Assessor's Office re property values	Ketchikan	Klugherz, Burden
01-26-00	Discussion with Borough Assistant Manager John Hozey re economic issues	Ketchikan	Klugherz, Burden
01-26-00	PDT meeting in Ketchikan (with teleconference links to Juneau and Anchorage)	Ketchikan	Project Team
01-26-00	Public meeting advertisement in <i>Ketchikan Daily News</i>	Ketchikan	---
01-27-00	Public meetings to present project alternatives (11:00 a.m. and 5:00 p.m.)	Ketchikan	Project Team
01-27-00	KRBD radio interview	Ketchikan	Dalton, Brooks, Kyle
01-27-00	Public comment period after 01-27-00 public meetings (01-27 to 03-17)	---	---
01-29-00	Presentation of project status to Senator Frank Murkowski and staff during his meeting with Borough	Ketchikan	Klugherz
02-01-00	Discussion with USFS re wetland functions and wildlife use of wetlands	Juneau	Leggett
02-01-00	Telephone interview with Gateway City Realty re housing market and general economy	Ketchikan	Klugherz
02-01-00	Interview with Tongass Realty re commercial and residential rental market	Ketchikan	Klugherz
02-01-00	Interview with Mayor of Metlakatla re economy	Ketchikan	Klugherz
02-02-00	General discussion with USFS Research Laboratory regional soil scientist re wetland functions	Juneau	Leggett
02-02-00	Interview with State Parks ranger re access to visitor data in area	Ketchikan	Klugherz
02-03-00	Interview with president of Gateway Forest Products re the timber industry in Ketchikan	Ketchikan	Klugherz

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
02-03-00	Interview with executive director of Ketchikan Visitors Bureau re the state tourism industry in Ketchikan	Ketchikan	Klugherz
02-07-00	Discussion with Ketchikan Indian Corporation Tribal Council	Ketchikan	Klugherz
02-10-00	Project update to the Ketchikan Chamber of Commerce Transportation Committee	Ketchikan	Klugherz
02-26-00	GAP Newsletter, Volume 3, with description of 12 preliminary project alternatives and status of ongoing technical studies (insert in <i>Ketchikan Daily News</i> weekend edition, February 26-27, plus overrun)	Ketchikan	---
03-13-00	Meeting on Gravina Island planning activities and secondary and cumulative impacts with Alaska Department of Natural Resources (DNR), USFS, Borough, DOT&PF, and Steve Planchon (Trust Land Office [TLO])	Ketchikan	Dalton, McPherson, Klugherz, Hippe
03-13-00	Meeting with floatplane operators to discuss access options and preliminary ideas about the potential impacts	Ketchikan	Dalton, Hippe, Peters, McPherson, Klugherz
03-14-00	Field reconnaissance of proposed road alignment to Seley Mill site with Borough and USCOE staff.	Ketchikan	Dalton
03-15-00	Meeting with Kris Geldaker of Cruise Line Agencies of Alaska re Marine Safety Task Force input.	Ketchikan	Dalton, Klugherz
03-15-00	Meeting with Borough staff re Gravina Island land planning	Ketchikan	Klugherz, McPherson, Hippe, Dalton
03-15-00	Meeting with area pilots re Tongass Narrows aircraft use	Ketchikan	Dalton
03-20-00	Meeting with John Clifton of the Tongass Narrows Work Group	Ketchikan	Dalton, Klugherz
04-04-00	Project team briefing to DOT&PF staff (Centennial Hall)	Juneau	Project Team
04-04-00	Meeting with Jim Helfinstine, USCG, and Tim Haugh, Federal Highway Administration (FHWA)	Juneau	Dalton, Kyle, Brooks, Hutchison
04-06-00	Presentation to the Alaska Department of Commerce, Alaska marine pilots, and Alaska Marine Pilots board	Anchorage	Dalton, Brooks, Kyle, Klugherz, Hutchison
04-06-00	Discussion with Grahame Burton of Princess Cruises, Bill Sharp of Holland America, and Les Cronk of Cruise Line Agencies of Alaska	Anchorage	Dalton, Brooks, Kyle, Hutchison, Klugherz
04-00-00	Public service announcement for 04-12-00 public meeting	Ketchikan	Brooks
04-08-00	Public meeting advertisement in <i>Ketchikan Daily News</i> for 04-12-00 public meeting	Ketchikan	---
04-08-00	Postcard mailer to all box holders in Ketchikan area re 04-12-00 public meeting	Ketchikan	---
04-11-00	PDT meeting in Ketchikan at the Ted Ferry Civic Center, 2:00 to 4:00 p.m. (with teleconference links to Juneau and Anchorage)	Ketchikan, Juneau, Anchorage	Project Team
04-12-00	KRBD radio interview	Ketchikan	Dalton, Brooks, Morrow
04-12-00	Two public meetings re project alternatives (11:00 a.m. and 5:00 p.m.)	Ketchikan	Project Team
04-13-00	Meeting with Ketchikan Chamber of Commerce Transportation Committee	Ketchikan	Dalton, Kyle, Brooks, Klugherz, McPherson, Reich
04-13-00	Presentation to City of Saxman and Saxman IRA Council, including subsistence and other traditional activities on Pennock and Gravina Islands	Saxman	Reich, Dalton

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
04-13-00	"HDR Presents More Gravina Options," article on electronic news page www.kanoe.com	World Wide Web	---
04-15-00	Feature article in <i>Ketchikan Daily News</i> weekend edition (April 15-16, 2000): "Engineers Estimate Gravina Crossing Costs, Prices for Bridge, Tunnel and Combination Options Span a Range from \$63 Million to \$384 Million"	Ketchikan	---
04-15-00	Display at Ketchikan Chamber of Commerce Expo (two days)	Ketchikan	Klugherz
04-21-00	Alternative analysis discussion with DOT&PF's Morrow, Yost, and Healy	Juneau	Dalton, Snead
04-21-00	Meeting with USCG and Capt. Winter, marine pilot	Juneau	Dalton, Snead
04-24-00	Project briefing to DOT&PF Commissioner	Juneau	Keen, Kyle, Dalton
04-25-00	Project briefing at Metlakatla	Metlakatla	Snead, Dalton
05-08-00	<i>Ketchikan Daily News</i> editorial, "Input Sought," encouraging public input	Ketchikan	---
05-10-00	Meeting for floatplane operators (no operators attended)	Ketchikan	Dalton, Peters, Klugherz, Hippe
05-11-00	Presentation to Technical and Operations Committee of the North West Cruiseship Association	Vancouver	Dalton, Kyle, Klugherz
05-15-00	Cruise vessel navigation demonstration (with Jim Helfinstine, USCG, and others)	Ketchikan	Dalton, Kyle
05-16-00	PDT meeting in Ketchikan (with teleconference links to Juneau and Anchorage)	Ketchikan	Project Team
05-16-00	Elected officials meeting at Ted Ferry Civic Center, 6:00 to 7:00 p.m.	Ketchikan	Dalton, Keen, Kyle, Klugherz
05-17-00	Meeting with Ketchikan Chamber of Commerce board	Ketchikan	Dalton
05-30-00	Presentation of project update to Colin Chapman, administrative assistant to Congressman Don Young.	Ketchikan	Klugherz
06-15-00	Meeting with Eric Hummel of Tongass Conservation Society (TCS).	Ketchikan	McPherson, Dalton
06-15-00	Meeting with Susan Dickinson and Steve Reeve (Borough), Dave Miller (KIA), and Roger Healy (DOT&PF) re planned taxiway improvements	Ketchikan	Klugherz, Dalton, McPherson
06-15-00	Ketchikan Pulp Company (KPC) Mill redevelopment and brownfields planning meeting	Ketchikan	McPherson, Dalton
06-16-00	Meeting with USFS Gravina Timber Sale EIS staff (Jerry Ingersoll, Susan Marthaller, et al.) re coordination of timber sale EIS studies with Gravina access EIS studies, particularly for cumulative and secondary impacts	Ketchikan	Dalton, McPherson
06-19-00	Meeting with DOT&PF (Winters, Skagerberg, Moore) to discuss parallel taxiway design at KIA	Juneau	Dalton
06-28-00	Display for Gravina Access Project located at the KIA	Ketchikan	Dalton, Klugherz
08-03-00	PDT meeting (with teleconference links to Anchorage, Juneau, Portland, and Seattle)	Ketchikan, Anchorage, Juneau, Portland, Seattle	McPherson, Dalton, Hippe, Brooks, Kyle, Snead
10-01-00	GAP Newsletter, Volume 4, with description of 18 identified build options (insert in <i>Ketchikan Daily News</i> plus overrun)	---	---

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
12-12-00	PDT meeting (with teleconference links to Anchorage, Juneau, and Portland)	Ketchikan, Anchorage, Juneau, Portland	McPherson, Dalton, Brooks, Snead
04-04-01	Meeting with DOT&PF re clarification of alternatives definitions	Juneau	Dalton
05-07-01	Meeting with DOT&PF to discuss refinement of preliminary options	Juneau	Kyle, Dalton, Hippe
05-23-01- 05-24-01	Meetings with residents of Pennock Island and Clam Cove on Gravina Island	Ketchikan	Dalton
09-27-01	Meeting with DOT re preliminary bridge structures technical memorandum	Juneau	Kyle, Dalton
10-11-01	Meeting with Alaska Air Chief Pilot (Terry Smith)	Anchorage	Hippe, McPherson
01-07-02	Borough Assembly meeting	Ketchikan	Dalton, Healy
01-21-02	Borough Assembly meeting	Ketchikan	Dalton, Healy
02-07-02	Ketchikan City Council Meeting	Ketchikan	Dalton, Healy
02-08-02	Ketchikan Chamber of Commerce (at Ketchikan City Council chambers)	Ketchikan	Dalton, Healy
02-08-02	Joint meeting with Saxman City Council, Saxman IRA Council, and the Cape Fox Corporation Board (at Saxman City Hall)	Saxman	Dalton, Healy
02-09-02	GAP Newsletter, Volume 5, with identification of 8 reasonable project alternatives as evaluated in detailed engineering and environmental studies and announcement of DOT&PF's recommended alternative (insert in <i>Ketchikan Daily News</i> , plus overrun)	---	---
02-11-02	Meeting with marine pilots	Ketchikan	Dalton
02-11-02	Open house public meeting	Ketchikan	Dalton, Healy, Project Team
02-19-02	Meeting with Ketchikan Visitors Bureau	Ketchikan	Healy
02-26-02	Borough Planning Commission meeting	Ketchikan	Dalton
02-08-02	Cape Fox Corporation chief executive officer, Saxman Mayor, and a marine pilot	Cape Fox Corporation	Dalton, Healy
02-08-02	Ketchikan Economic Development Authority meeting	Ketchikan	Dalton, Healy, Burden
03-05-02	Meeting with USCG regarding bridge clearances	Juneau	Dalton, Healy
03-06-02	PDT meeting (with teleconferences in Anchorage and Seattle)	Ketchikan, Anchorage, Seattle	Project Team
03-06-02	Meeting with elected officials at Ted Ferry Civic Center	Ketchikan	Dalton, Healy, Burden, Maines
03-12-02	Meeting with Borough Planning Commission re project alternatives	Ketchikan	Dalton, Healy
05-23-02	Kickoff meeting for project Notice to Proceed (NTP) 8	Seattle	Project Team
06-18-02	Meeting with EPA re content of EIS	Seattle	Dalton
07-01-02	GAP Newsletter, Volume 6, with description of public scoping activities on reasonable alternatives (insert in <i>Ketchikan Daily News</i> plus overrun)	---	---
07-12-02	Meeting with City of Saxman and Cape Fox Corporation	Saxman	Maines, Burden
09-04-02	Meeting with Ketchikan Economic Development Authority (KEDA) board	Ketchikan	Dalton, Healy

**TABLE 7-1
PROJECT SCOPING ACTIVITIES (1999-2002)**

<i>Date</i>	<i>Scoping Activity</i>	<i>Location</i>	<i>Project Team Representative(s)*</i>
09-26-02	Open House at the Ketchikan Project Office	Ketchikan	Dalton, Healy, Maines
09-26-02	Ketchikan Economic Development Authority meeting	Ketchikan	Dalton, Healy, Maines
09-23-02	Ketchikan Project Office Open	Ketchikan	Maines, Ohlsen
09-30-02			
10-15-02	Ketchikan Project Office Open	Ketchikan	Maines
10-17-02			
3-17-03	Ketchikan Project Office Open	Ketchikan	Maines
3-19-03			
4-2-03	Ketchikan Project Office Open	Ketchikan	Maines
4-4-03			
4-29-03	Ketchikan Project Office Open	Ketchikan	Maines
5-1-03			

Sources: DOT&PF, GAP Scoping Summary Report—June 2000 Supplement, by HDR Alaska (October 2000); and Project Team files

* Brooks, Anne (Brooks & Associates); Burden, Pat (Northern Economics); Dalton, Mark (HDR); Garber, Sorin (HDR); Haugh, Tim (FHWA); Healy, Roger (DOT&PF); Hippe, Duane (HDR); Hutchison, Bruce (The Glosten Associates); Keen, Eric (HDR); Klugherz, Mary (Maritime Strategy International, Inc., formerly with Klugherz & Associates); Kyle, Larry (HDR); Leggett, Anne (HDR); Maines, Kristen (HDR); McPherson, John (HDR); Morrow (DOT&PF); Morsell (formerly Boggs), Sally (HDR); Peters, Stephen (Millard + Peters); Ohlsen, Ron (HDR); Reich, Robin (HDR); SlatonBarker, Carla (HDR); Snead, Carol (HDR); John Springer (The Glosten Associates).

7.2 Summary of Scoping Meeting Comments

7.2.1 Agency Scoping Comments

At the September 27, 1999, agency scoping meeting, agency representatives voiced their concerns about the project and issues of particular interest. The agencies were also asked to identify information gaps, fieldwork, and special studies that would be helpful in preparing this EIS. The meeting was followed by a comment period, during which the agencies submitted written comments. The comment period deadline was initially October 13, 1999, but this deadline was later extended until October 27, 1999, at agency request.

Following are the topics addressed and the information needs identified in the agencies' comments (both verbal and written). These topics and information needs are excerpted from the scoping summary reports, which include the full text of all agency comment letters.⁶ See also Appendix R.

⁶ DOT&PF, *GAP Scoping Summary Report* (December 1999) and *GAP Scoping Summary Report—June 2000 Supplement* (October 2000), prepared by HDR Alaska.

7.2.1.1 Federal Agencies

Federal Aviation Administration (FAA)

- Bridge impacts on navigable airspace
- Impacts on Ketchikan International Airport
- Heavy use of the airspace by aircraft flying under visual flight rules

National Oceanic and Atmospheric Administration (NOAA) Fisheries - Previously National Marine Fisheries Service (NMFS)

- Impacts on fish and marine invertebrates and mammals
- Relationship between the Gravina Access Project and Ketchikan 2020
- Minimization of direct, indirect, and cumulative impacts
- Impacts of noise on marine mammals and fish
- Consultation requirements of the Endangered Species Act (ESA)
- Essential fish habitat (EFH) requirements

The NMFS could potentially help with studies if needed.

U.S. Army Corps of Engineers, Regulatory Branch (COE)

- Probable need for Section 10 and Section 404 permits
- Compensatory mitigation
- Long-term maintenance
- Storm water
- Purpose of and need for the project
- Public support
- Identification of appropriate development on Gravina Island
- Evaluation of all practicable alternatives
- Impact on airport expansion plans
- Inclusion of proposed road system in project
- Cumulative and secondary impacts
- Impacts on land and water on both sides of Tongass Narrows
- Further information needs:
 - Jurisdictional wetlands determinations
 - Impacts of airport expansion, new roads, and development
 - Bathymetry, geology, currents, wind, tidal data, and weather patterns
 - Aquatic and other natural resources
 - Dive surveys

U.S. Coast Guard (USCG)

- Separate section in environmental document on navigational impacts
- USCG permit for a hard link
- Vertical and horizontal bridge clearances
- Potential confusion/ unwieldiness of combining the project with Ketchikan 2020

The USCG also provided navigation data prepared by its Marine Safety Detachment in Ketchikan.

U.S. Environmental Protection Agency (EPA)

- Purpose and need statement requirements
- Inclusion of other planning efforts being undertaken with the access project
- Indirect and cumulative impacts of the project and subsequent development
- Description of wetlands types, acreage, and locations, functions, and values
- Evaluation of freshwater sources for availability, type, and quantity
- Effects of development on Gravina hydrology, water quality, and fish habitat
- Impacts of storm water, wastewater, and sewage associated with development

The EPA also noted that project funding is secure only for the environmental process and design.

U.S. Fish and Wildlife Service (USFWS)

- Cumulative and secondary impacts on fish and wildlife resources and habitats
- Avoidance of development in the most productive and sensitive habitats
- Siting of roads away from the shoreline and obvious beach fringe areas

The USFWS offered assistance (through its dive program) with siting of marine facilities

U.S. Forest Service – Ketchikan Ranger District (USFS)

- Tie-in of a hard link into the USFS road system
- Impacts on Gravina road system of increased public access
- Potential confusion and complexity of considering project with Ketchikan 2020
- Potential access provided by project to USFS timber sale areas on Gravina
- Potential development of recreational facilities based on increased access
- Compatibility of USFS plans for federal lands with other Gravina landowners

7.2.1.2 State Agencies

Department of Environmental Conservation (DEC)

- Environmental safeguards to protect aquatic resources on Gravina Island

Department of Fish and Game (ADF&G)

- Impacts on fish and wildlife resources and habitat
- Public uses of fish and wildlife
- Secondary and cumulative effects, as well as direct impacts
- Need for field surveys for sensitive species and habitats
- Cumulative effects of linking Ketchikan to roads accessing most of Gravina
- Avoidance and mitigation of impacts
- Construction monitoring to protect water quality, fish, wildlife, and habitats

Department of Natural Resources – Division of Mining, Land and Water (DNR)

The DNR indicated it would become actively involved after development of the project alternatives.

Department of Natural Resources – Alaska Mental Health Trust (AMHT) Land Office

The Trust supports a hard link that accesses not only the airport but also Borough lands and Trust lands beyond the airport.

Department of Natural Resources – Office of History and Archeology

Native burial sites on Pennock Island

Resistance to construction on Pennock Island by Native residents

The Office of History and Archeology noted that the following Native entities should be contacted: IRA Councils of the Ketchikan Indian Corporation and the Organized Village of Saxman, and Cape Fox Corporation.

Alaska Division of Governmental Coordination (ADGC)

Relationship of Lewis Reef industrial development to project

Relationship between the project and Ketchikan 2020

DGC involvement will be limited until environmental permit applications have been submitted.

7.2.1.3 Local Agencies

Ketchikan Gateway Borough (KGB)

Need for close coordination with the Borough for comprehensive planning

Information needs:

Updated land use inventory for Gravina and Revillagigedo Islands

Updated Borough-wide base maps

System for data retrieval, maintenance, and analysis of mapped information

Current scalable, digital aerial photos compatible with digital map system

The Borough noted that land ownership on Gravina Island is more defined now that the status of Mental Health Trust Land has been resolved.

7.2.2 Public Scoping Comments on Project Issues

At the October 6, 1999, public scoping meeting, members of the public commented verbally about the project. The public was also invited (at the meeting and in the October 13 edition of the *Ketchikan Daily News*) to submit written comments via mail or e-mail. Written comments were received up to late October 1999.

Following are the topics addressed in the public comments (both verbal and written) on project issues and concerns. These issues are excerpted from the scoping summary reports, which include the full text of all public comments⁷. See also Appendix R.

Access to Gravina Island

Need for access by emergency response providers and airport passengers

⁷ DOT&PF, *GAP Scoping Summary Report* (December 1999) and *GAP Scoping Summary Report—June 2000 Supplement* (October 2000), prepared by HDR Alaska, Inc.

Airspace

Interference of bridge with floatplane traffic

Biological Resources

Protection of sensitive species and habitats on Gravina Island

Burial Grounds

Disturbance of Native burial grounds on Pennock Island by bridge construction

Community Support

Sufficiency of community support

Comprehensive Planning

Length of planning period before action

Completion date of Borough comprehensive plan for Gravina Island

Coordination of project and Borough's long-range planning

Relationship of project to Gravina Island comprehensive plan

Cost/Benefit Analysis

Role of cost/benefit analysis in decision to construct an improvement

Small number of people who would benefit from project

Previous cost/benefit analysis of bridge and ferry alternatives

Development of Gravina Island

Dependence of Gravina Island development on this project and Borough planning

Percentage of Gravina Island land that is actually developable

Developing roads on Gravina Island before planning hard link access

Access to Gravina Island lands as well as airport

Fostering of development opportunities by road access

Development of road corridor without waiting for the access project

Permittability of a road on Gravina Island by regulatory agencies

Economic Development and Jobs

Economic development as a stated project need

Identification of land suitable for development on Revillagigedo and Gravina Islands

Identification of biological resource constraints on development

Creation of jobs by project construction and Gravina Island development

Economic constraints (lack of developable land) in Ketchikan

Comparison of development potentials on Revillagigedo Island vs. Gravina Island

Funding

Source of project funding

Whether community will pay for a portion of the project

Infrastructure

Increase in demand for power and water generated by project
Impacts on parking and access roads to the airport

Land Use Planning

Development of land use assumptions before Gravina Island hard link
Need for land use decisions to accurately forecast Gravina Island traffic
Public review of assumptions about land use and traffic generation

Landfill

Possible location of landfill on Gravina Island

Maintenance

Maintenance required by bridge and tunnel

Marine Navigation

Congestion of Tongass Narrows
Vertical clearance of bridge (accommodation of cruise ships)

Other Community Needs

Other important community needs, such as recreational land
Possible preclusion of funding for other important projects by access project

Pennock Island Crossing

Opposition of residents to previously proposed crossing via Pennock Island

Previous Studies

Use of previous studies by DOT&PF on the Tongass Narrows crossing

Purpose of and Need for Project

Development on Gravina as project purpose and need compared to safety

Traffic Congestion

Relief of traffic congestion on Revillagigedo Island by Gravina Island hard link

Visual Environment

Unattractive appearance of bridge and development on Gravina Island

Water Quality

Impact of Gravina development on water quality

Wetlands on Gravina

Criteria used to make wetlands developable
Disturbance or destruction of wetlands by Gravina Island development

Classification of wetlands on Gravina Island

7.2.3 Public Suggestions for Project Alternatives

Members of the public were also provided with a map of the project area and asked to suggest specific crossing alignments and access modes (e.g., bridge, tunnel, ferry, etc.). These other suggested alternatives are listed in the project *Scoping Summary Report*.⁸

7.3 Project Development Team (PDT)

7.3.1 Purpose and Membership

During the initial scoping process, the DOT&PF formed the Project Development Team (PDT) to provide for regular communication with and frequent input from interested agencies and key project stakeholders. This group was established as the regular forum for continuing the dialog begun in the initial agency scoping meeting, and is continuing in this role until completion of the EIS. The objectives of the PDT were established to provide:⁹

- 1—A communication and coordination tool that helps the project team remain in regular, close contact with the agencies and local governments
- 2—A forum for reviewing technical studies, fieldwork, and draft reports
- 3—A forum for updating participants regarding the overall project schedule
- 4—A platform for the participants to voice concerns early in the process so that concerns can be addressed efficiently without adding undue delays
- 5—An opportunity for the participants to become familiar with the technical studies and discuss them directly with the technical experts who conducted them
- 6—An opportunity for the concurrence agencies to merge the NEPA and Section 404 permit review processes, including participation in the project team's development of the project purpose and need statement and the reasonable alternatives

Member Agencies. The PDT members comprise representatives of the following groups:

Federal Aviation Administration (FAA)
Federal Highway Administration (FHWA)
National Oceanic and Atmospheric Administration, NOAA Fisheries (previously National Marine Fisheries Service [NMFS])
U.S. Army Corps of Engineers (COE)
U.S. Coast Guard (USCG)
U.S. Environmental Protection Agency (EPA)
U.S. Fish and Wildlife Service (USFWS)
U.S. Forest Service (USFS)
Alaska Department of Fish & Game (ADF&G)
Alaska Department of Environmental Conservation (ADEC)
Alaska Department of Natural Resources

⁸ DOT&PF, *GAP Scoping Summary Report*, prepared by HDR Alaska (December 1999)

⁹ DOT&PF, *GAP Project Development Team Memorandum (Draft)*, prepared by HDR Alaska (December 1999)

Alaska Department of Transportation and Public Facilities (DOT&PF)
Alaska Division of Governmental Coordination (ADGC)
Alaska Mental Health Trust Land Office
Ketchikan Gateway Borough (Borough)
City of Ketchikan
City of Saxman
Ketchikan International Airport (KIA)
Cape Fox Corporation
Ketchikan Indian Corporation
Saxman IRA Council
HDR Alaska and other project team consultants

7.3.2 Meetings

The PDT has met periodically in Ketchikan, with teleconference connections to sites in Anchorage and Juneau.

November 4, 1999. At the initial meeting of the PDT, presentations were made by senior members of the project team to acquaint the PDT membership with the purpose of the PDT, the content of two in-process technical memoranda (on aviation and navigation), the scoping comments received from the participating regulatory agencies, the working draft of the project's purpose and need statement, and the upcoming work activities of the project team members.

December 14, 1999. The PDT was informed about ongoing public outreach activities and preliminary engineering activities, including base mapping, a geotechnical report, development of design criteria, consultation regarding threatened and endangered species, inventory of land uses, a ferry passenger survey, updating and forecasting economic conditions using three growth scenarios, survey of the shoreline marine environment, and biological resources fieldwork. The draft purpose and need statement was discussed in detail, and many suggestions were made for additions and revisions by the agency representatives.

January 26, 2000. The meeting centered on developing the project's purpose and need statement, to initiate the agency concurrence process. The project team presented the status of ongoing technical studies. Nine initial project options were described (including bridge, tunnel, and ferry modes): A, G1, B, C1, C2, D, E, G3, and F1. The PDT was asked to comment on these options to identify potential "fatal flaws" and unrecognized major impacts, and was updated on other current planning projects in the Borough.

April 11, 2000. The main topics of this meeting were the ongoing technical studies and the presentation of further details of the project options under consideration: A, B, C1, C2, C3, C4, D, D (moveable), E, E2, F1, F2, G1, G2, and G3.

May 16, 2000. Members were asked for feedback on the completed drafts of the technical memoranda, and were briefed on two new options, G4 and F3. The team also presented the methodology for screening the project options to determine which options are reasonable alternatives for detailed analysis in the EIS, and solicited input from the PDT members regarding the process.

August 3, 2000. The project team listed the screening factors to be used in evaluating project options. The PDT members suggested refinements to some factors and for new factors. The project team also reported on life-cycle costs.

December 12, 2000. Members reviewed and commented on the project team's proposed list of seven reasonable alternatives: C3, C4, D1, F3, G2, G3, and G4. Concurrence on these alternatives was to be formally requested from the participating agencies. The PDT also noted and discussed concurrent planning activities.

March 6, 2002. Most of the discussion focused on the *GAP Alternatives Evaluation Summary Report*, completed in January, and the adequacy of the more than 20 technical studies summarized in the report. The DOT&PF's designation of Alternative F3 as its preliminary preferred alternative was discussed, and, in light of F3's unresolved navigational issues, several PDT members asked that Alternative F1 be reconsidered as a reasonable alternative.

7.4 Agency Coordination and Concurrence Process

7.4.1 Lead and Cooperating Agencies

For this project, the Federal Highway Administration (FHWA) is the lead federal agency for NEPA compliance. The following agencies accepted the invitation of DOT&PF to participate as cooperating agencies:

- U.S. Army Corps of Engineers (USACOE)
- U.S. Coast Guard (USCG)
- U.S. Environmental Protection Agency (EPA)
- Ketchikan Gateway Borough
- City of Ketchikan

7.4.2 Agency Concurrence

In June 1997, the DOT&PF and the Federal Highway Administration (FHWA) Alaska Division entered into an Interagency Working Agreement to Integrate Section 404 and Related Permit Requirements into the National Environmental Policy Act. The agreement integrates the Clean Water Act Section 404(b)(1) process and other Section 404-related permitting and certification requirements with the NEPA process. Signatories of the agreement are committed to ensuring the earliest possible identification and consideration of environmental concerns to waters of the United States, including wetlands, in the planning, design, and construction of Federal-aid highway projects.

The concurrence agreement was developed to allow the NEPA and Section 404 processes to run concurrently instead of sequentially, as with the traditional approach. This merged process is designed to identify issues of concern early in the project, as well as the need for additional environmental studies to meet requirements of NEPA and Section 404. The benefit of this process is that it streamlines the environmental review and identifies and resolves potentially contentious issues early in the project.

The resource agency signatories to this agreement are:

- U.S. Army Corps of Engineers (COE)
- U.S. Environmental Protection Agency (EPA)
- National Oceanic and Atmospheric Administration, NOAA Fisheries (previously National Marine Fisheries Service [NMFS])
- Alaska Department of Fish and Game (ADF&G)
- Alaska Department of Natural Resources (DNR)
- Alaska Department of Environmental Conservation (DEC)
- Alaska Division of Governmental Coordination

The U.S. Fish and Wildlife Service (USF&WS) participated in the concurrence process, but was not a signatory to the concurrence agreement.

Concurrences. The merged process resulted in agency concurrence on the project's purpose and need statement (in February 2000) and on which of the initial project options would be analyzed in the DEIS as reasonable alternatives (in February 2001 and, by addendum, in June 2002). A third planned concurrence review—of the preferred alternative—was not conducted because the agreement expired in June 2002.

Additional informal and ongoing consultation with the agencies has occurred on items relating to essential fish habitat and other information necessary for the preparation of the draft EIS.